

IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

JENNAH M. GASKINS,)	
Plaintiff)	
)	
v.)	CASE NO.:
)	
TIMOTHY F. ROSS, AMERITRANS)	
GROUP, INC., OC)	
TRANSPORTATION, INC, and THE)	
MASON AND DIXON LINES)	
INCORPORATED a/k/a UNIVERSAL)	
INTERMODAL SERVICES, INC.)	
Defendants)	

COMPLAINT FOR DAMAGES AND JURY DEMAND

Comes now the plaintiff, Jennah M. Gaskins, by counsel, Andrew A. Crosmer of Rubino, Ruman, Crosmer & Polen, LLC, and for her cause of action against defendants, Timothy F. Ross, Ameritrans Group, Inc., OC Transportation, Inc., and The Mason and Dixon Lines Incorporated a/k/a Universal Intermodal Services, Inc., states as follows:

1. That the plaintiff is a citizen of the State of Indiana.
2. That the defendant, Timothy F. Ross, is a citizen of the State of Alabama.
3. That the defendant, Ameritrans Group, Inc., is a Georgia corporation with its principle place of business in the State of Georgia.
4. That the defendant, OC Transportation, Inc., is a Georgia corporation with its principle place of business in the State of Georgia.

5. That the defendant, The Mason and Dixon Lines Incorporated a/k/a Universal Intermodal Services, Inc., is a Michigan corporation with its principle place of business in the State of Michigan.

6. That the matter in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs. Jurisdiction is based upon diversity of citizenship.

7. That on or about July 17, 2020, plaintiff Jennah M. Gaskins was operating her vehicle eastbound on US 20 in Gary, Lake County, Indiana.

8. That at said time and place, defendant Timothy F. Ross was operating a semi-tractor trailer owned by defendants Ameritrans Group, Inc., OC Transportation, Inc. and The Mason and Dixon Lines Incorporated a/k/a Universal Intermodal Services, Inc., eastbound on US 20, directly behind the plaintiff.

9. That at said time and place, defendant Timothy F. Ross was the agent, servant, and/or employee of defendants Ameritrans Group, Inc., OC Transportation, Inc. and The Mason and Dixon Lines Incorporated a/k/a Universal Intermodal Services, Inc..

10. That at said time and place defendant Timothy F. Ross was at fault in causing a collision to occur with the plaintiff's vehicle.

11. That the defendants, Ameritrans Group, Inc., OC Transportation, Inc. and The Mason and Dixon Lines Incorporated a/k/a Universal Intermodal Services, Inc., are vicariously liable for the negligence of defendant, Tim F. Ross, and were

negligent, reckless, and willful and wanton in the hiring, supervising, training and retention of the defendant, Timothy F. Ross.

12. That as a direct and proximate result of said misconduct and fault by the defendants, the plaintiff, Jennah M. Gaskins, was injured, some of which injuries may be permanent, incurred medical expenses, lost wages, and was otherwise damaged.

WHEREFORE, the plaintiff prays for judgment against the defendants in a sum which will reasonably compensate her for her damages in excess of the jurisdictional minimum of this Court, plus costs, including attorney's fees for any frivolously asserted affirmative defenses, interest and any other proper relief.

s/Andrew A. Crosmer
ANDREW A. CROSMER, #11531-45
Rubino, Ruman, Crosmer & Polen
Attorney for Plaintiff

JURY DEMAND

Comes now plaintiff, by counsel, and demands trial by jury.

s/Andrew A. Crosmer
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